

Vincent F. Papalia, Esq.
Mark A. Roney, Esq.
SAIBER LLC
18 Columbia Turnpike, Suite 200
Florham Park, New Jersey 07932

*Proposed Counsel to Debtors and
Debtors in Possession*

In re: CHEMITEK 2006, LLC d/b/a River Vale Country Club, Debtor.	Chapter 11 Case No. 10-13393 (DHS) Honorable Donald H. Steckroth
In re: PALISADES PARK PLAZA NORTH, INC., Debtor.	Chapter 11 Case No. 10-13393 (DHS) Honorable Donald H. Steckroth
In re: KWANG HO KEH, Debtor.	Case No. 09-28922 (DHS) Chapter 11 Honorable Donald H. Steckroth

**NOTICE OF MOTION OF THE DEBTORS PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE 1015(b) FOR AN ORDER
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

PLEASE TAKE NOTICE that on the 9th day of March, 2010 at 10:00 a.m. or as soon thereafter as counsel may be heard, debtors Chemitek 2006, LLC d/b/a River Vale Country Club (“Chemitek 2006”), Palisades Park Plaza North, Inc. (“PPPN”) and Kwang Ho Keh (“Keh”) as debtors and debtors in possession (collectively, the “Debtors”), shall move for an order authorizing the Debtors pursuant to Federal Rule of Bankruptcy procedure 1015(b) for an Order directing Joint Administration of Chapter 11 Cases (the “Motion”).

PLEASE TAKE FURTHER NOTICE that responses in opposition to the Motion shall be filed with the Court and served upon proposed counsel to the Debtors within 7 days of the above-referenced hearing date. Untimely responses may not be considered by the Court.

PLEASE TAKE FURTHER NOTICE that the Debtors request oral argument with respect to the Motion only if timely opposition is filed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that the Debtors submit no brief or memorandum of law in connection with this Motion, there being no disputed questions of law involved. If a disputed question of law should arise on the return date of the Motion, the Debtors reserve the right to file a brief or memorandum of law in accordance with any timetable set by the Court.

SAIBER LLC

Proposed Attorneys for Debtors and
Debtors in Possession

By: /s/ Vincent F. Papalia
VINCENT F. PAPALIA
MARK A. RONEY

Dated: February 15, 2010
Florham Park, New Jersey